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January 7, 2009

Lixin Fu
Water Discharge to Land Unit
California Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

Re: Tentative WDR Comments for Pine Grove CLS

Dear Ms. Fu:

Please find our minor comments to the Tentative Waste Discharge Requirements listed below.

## Findings:

- 1. Page 3, Finding 11:
  - a. Delete "other areas of the disposal system, especially in" as the need for additional surface diversion features for the existing leachfield were already performed under the existing WDR Order.
- 2. Page 4, Finding 16:
  - a. Delete this in its entirety. It may be changed to something similar to Finding 15. The developer has opted to eliminate the Lift Station and use the same pressurized, pumped system as the existing system.
- 3. Page 5, Finding 31:
  - a. Change "Pine Grove drinking water is provided by the Discharger and is obtained from the Mokelumne River" to "Pine Grove drinking water is provided by Pine Grove Community Service District to whom the Discharger sells treated water wholesale and is obtained from the Mokelumne River. Pine Grove CSD is solely responsible for operation, maintenance and testing of the drinking water distribution system within their sphere of influence."
- 4. Page 13, Finding 66.a:

a. Change "The waste consists primarily of domestic sewage..." to "The waste consists of both domestic and commercial sewage..."

## **Discharge Prohibitions:**

- 5. Page 14, Order A.6:
  - a. Change "The presence of leachate within one foot of the lowest finished disposal field grade is prohibited" to "The presence of leachate within one foot of ground surface elevation of the lowest finished disposal field is prohibited."
- Page 16, Order 10
  - a. Delete "There, no bent tube is allowed in all leachfield under this order and replace it with, "Bent leachline laterals, at the terminus of each lateral are permitted as these facilitate easier and more thorough cleaning of the leachline laterals."
- 7. Page 17, Order E.b
  - Background water quality observed in the background wells demonstrate that the pH limit of the existing geology is outside this range, therefore the proposed limits are not obtainable.
- 8. Page 18, Provision F.1.a and F.1.b
  - a. Amador Water Agency acknowledges that new Monitoring Wells will be required. Therefore, please revise provision F.1.a and F.1.b thereby immediately beginning with a Groundwater Monitoring Well Workplan due by August 1, 2009.

## Monitoring and Reporting Program:

- Page 4, Water Supply Monitoring:
  - a. Revise this section to only require Amador Water Agency to submit a copy of Pine Grove CSD's annual report to the Department of Public Health. Amador Water Agency does not own, operate or maintain this system nor does it have jurisdiction to test this system. It is currently owned, operated, maintained and licensed to Pine Grove CSD.

## **Information Sheet:**

10. Page 1, Effluent Collection System:

a. Change "1,200-gallon septic tank..." to "1,500 gallon septic tank..."

- 11. Page 2, Effluent Collection System:
  - a. Change the last paragraph to "For Phase 2 CLS, the effluent from each service connection will be pumped via a submersible pump to pressurized PVC mains and then will flow to the existing pressurized mains and the disposal system."

Please contact me with any questions at (209) 257-5242.

Sincerely,

Erik M. Christeson, P.E. Supervising Engineer

cc (w/o attachments):

Gene Mancebo, Manager of Engineering & Planning Chris McKeage, Operations Manager Dave Loftis, Wastewater Supervisor Jesse Shaw, Toma & Associates Del Rapini File